

September 28, 2007

Mr. Christopher A. Whyrick
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RAI) dated September 13, 2007, referencing the July Quarterly FEC Report (4/1/07 - 6/30/07). The Committee's response follows.

Schedule A-P

As we previously indicated, the Committee utilizes stringent internal controls relative to contribution solicitations (informing potential donors of both source and limit prohibitions), receipts processing, and compliance follow-up procedures that fully comply with federal regulatory guidelines. Based on the Committee's regular compliance procedures and the information in the Committee's possession, all donations received that exceed the contribution limits are either reattributed, redesignated, or refunded within the 60-day time period as set forth in 11 CFR 110 and as noted in the memo text on all such transactions itemized in the Committee's public disclosures.

In some cases, the Committee obtains new information about donors subsequent to filing a disclosure report. This new information and any adjustments to donor aggregate amounts are reported in amendments.

The Committee has carefully reviewed each situation listed in the RAI to confirm that the disposition of contributions that were reported as requiring reattribution, redesignation, or refunding as of June 30, 2007 will be properly reflected in the October quarterly report. Any changes to donor information or to aggregate amounts from the second quarter are reflected in the amended July Quarterly Report (4/1/07 - 6/30/07) submitted on September 28, 2007.

Schedule B-P - Description Purposes

11 CFR 104.3(b)(3)(i)(B) provides several examples of acceptable purposes that committees may use in describing disbursement transactions on financial disclosure reports. In addition, in an effort to comply with both the text and spirit of the public disclosure regulations, the Committee consulted the Commission's Statement of Policy on Purpose of Disbursement reporting, 72 FR 887 (1/9/07) "Examples of Inadequate Purposes" list, which was revised on 3/5/07 and publicly disseminated by the Commission. Using these sources, the Committee has described the transactions cited in the RAI in accordance with all published guidelines that are available to the regulated community. Moreover, there is no indication in the regulations or Commission guidelines that the amount of a particular expenditure requires any different consideration with respect to the list of sufficient or insufficient descriptions for the purpose of disbursement. As such, the Committee believes that it has satisfied the legal requirements to itemize completely the referenced disbursement transactions on its July 2007 Quarterly Report and that no additional clarification is required.

Under 11 CFR 104.9 and other available FEC guidelines as referenced above, the committee can find no indication that "void check" is not a valid purpose when reporting transactions of this nature. With regard to the transactions questioned the committee was reporting checks that were issued to vendors in a prior period and because they were determined to be either duplicate or lost payments by the vendor, were voided in the reporting period so that the committee's reported cash on hand figures agree with its internal records. Therefore, there were no corporate in-kind contributions of any kind.

Sincerely,

John H. Gross
Treasurer